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Attorneys for Defendant
ROY LIN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROY LIN and JOHN LIN,

Defendants.

Case No.: CR-12-0217 WHA

**DEFENDANT ROY LIN'S UNOPPOSED
APPLICATION AND ~~PROPOSED~~ ORDER
FOR TEMPORARY DOMESTIC TRAVEL
OUTSIDE THE NORTHERN DISTRICT OF
CALIFORNIA**

On December 11, 2012, Defendant Roy Lin pled guilty to one count of mail fraud in violation of 18 U.S.C. § 1341 and one count of money laundering in violation of 18 U.S.C. § 1957. On May 1, 2013, the Court sentenced Mr. Lin to a term of thirty months of imprisonment. By order of this Court, Mr. Lin remains out of custody pending his voluntary surrender for service of his sentence on October 3, 2013, at FCI Terminal Island in San Pedro, California. The conditions of Mr. Lin's release prohibit him from traveling outside the Northern District of California. Mr. Lin respectfully requests that the Court permit him to travel outside the Northern District of California based on the following:

1. Before he is incarcerated, Mr. Lin desires to visit friends and family in North Carolina from September 9 to September 13, 2013.

1 2. Specifically, Mr. Lin wants to visit Dr. Jeffrey Sun and his family in Cary, North
2 Carolina. Dr. Sun, who wrote a character letter in support of Mr. Lin at sentencing, is Mr. Lin's
3 former minister at Canaan Taiwanese Christian Church in Mountain View, California. Dr. Sun
4 now is retired and lives on the East Coast. If allowed to travel, Mr. Lin and Dr. Sun also may visit
5 Raeford, North Carolina.

6 3. During this trip, Mr. Lin also would like to see his brother at Rivers CI in Winton,
7 North Carolina. In this case, this Court sentenced Mr. Lin's brother and co-defendant, John Lin,
8 to serve twenty months of imprisonment. John Lin has been designated to Rivers CI in Winton,
9 North Carolina, with a surrender date of September 3, 2013. The Lin brothers have a very close
10 relationship. Prior to his own surrender in California one month later, Roy Lin would like to ease
11 his younger brother's transition into prison by visiting to share what likely will be their last
12 moments together for nearly two years.

13 4. If granted permission by this Court, Mr. Lin will travel by airplane to Raleigh-
14 Durham International Airport in North Carolina, on Monday, September 9, 2013, and will return
15 to San Francisco, California on Friday, September 13, 2013.

16 5. During the entire time he is in North Carolina, Mr. Lin intends to stay at Dr. Sun's
17 home in Cary, North Carolina, and will be reachable locally on his mobile phone at 415-902-8254.

18 6. United States Pretrial Services Officer Josh Libby has been consulted as to a
19 proposed temporary modification of the terms of Mr. Lin's release to allow Mr. Lin to travel
20 outside the Northern District of California to visit friends and family in North Carolina during the
21 above-identified dates. Mr. Libby has stated that he does not object.

22 7. Mr. Lin's counsel, Jason Allen, contacted Assistant U.S. Attorney Hallie Hoffman
23 concerning this request. Ms. Hoffman advised Mr. Allen that the government does not oppose it.

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1 Accordingly, Mr. Lin respectfully requests that the terms of his release bond be modified
2 temporarily to permit the requested travel. Mr. Lin will continue to observe all other terms of his
3 release while in North Carolina.
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6 Dated: September 4, 2013

Respectfully submitted,

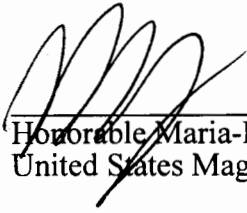
7 By: /s/
8 Patrick D. Robbins
9 Attorney for Defendant Roy Lin
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~~PROPOSED~~ ORDER

Based on the foregoing, and good cause appearing, IT IS HEREBY ORDERED that Defendant Roy Lin's conditions of release are hereby temporarily modified to permit him to travel outside of the Northern District of California consistent with the terms and conditions set forth above.

IT IS SO ORDERED.

Dated: 9-4-13, 2013



Honorable Maria-Elena James
United States Magistrate Judge